David H. Madden
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United States District Court

District of Oregon

Portland Division

Darryl PICKENS, an individual Plaintiff, v. Hon. Eric K. SHINSEKI, Secretary of Veterans Affairs; and DOEs 1 – 10, Defendants	Case No.: .... 09-CV-704-KI DECLARATION OF DAVID H. MADDEN IN SUPPORT OF PLAINTIFF'S EXHIBITS

I, David H. Madden, declare and state as follows:

1. I am the attorney for Plaintiff in this action. My statements in this declaration are based on personal knowledge. This declaration is submitted in support of Plaintiff's Exhibits A through I.

2. Attached as Exhibit A is a true and correct copy of the Equal Employment Opportunity Commission ("EEOC") complaint filed by Plaintiff on or about 17

December 2005.

3. Attached as Exhibit B is a true and correct copy of the EEOC complaint filed by Plaintiff on or about 1 March 2006.

4. Attached as Exhibit C is a true and correct copy of the EEOC complaint filed by Plaintiff on or about 30 March 2006.

5. Attached as Exhibit D is a true and correct copy of the EEOC complaint filed by Plaintiff on or about 17 December 2007. (The year of the date handwritten by Plaintiff, 2004, appears to be erroneous, based on stamps on the document itself and surrounding papers in the file.)

6. Each of Exhibits A through D is a digitally scanned copy from papers produced by the U.S. government in response to a Freedom of Information Act submitted by the undersigned. The response to the FOIA request includes several thousand additional pages which are not submitted herewith, but which Plaintiff will willingly make available for inspection or copying at Defendant's request.

7. Attached as Exhibits E through I are digitally scanned copies of documents in Plaintiff's possession, which appear to be performance reviews given to Plaintiff by his supervisors during his employment with Defendant.

I hereby declare that the above statements regarding Plaintiff's Exhibits in 09-CV-704-KI are true to the best of my knowledge and belief, and I understand that they are made for use as evidence in court and are subject to penalty for perjury.

4 April 2011	/s/David H. Madden/
Date	David H. Madden, OSB No. 080396